

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

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JUN 9 1992

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In Re )  
 )  
Amendment of Section 73.202(b) ) RM-\_\_\_\_\_  
 )  
Table of Allotments, )  
FM Broadcast Stations )  
(Ludlow, CA) )

To: The Chief Allocations Branch

**PETITION FOR RULEMAKING**

Miracle Broadcasting, by its attorney, pursuant to Section 1.401 of the Commission's Rules, hereby respectfully petitions the Commission to amend the FM Table of Allotments, Section 73.202(b) of the Commission's Rules, to add Channel 261B1 at Ludlow, California.

In support thereof, the following is respectfully shown:

1. The allotment of Channel 261B1 to Ludlow, California would provide that community with its second local broadcast service. Presently allotted to the community is Channel 289A. Thus, the instant request will provide Ludlow and the surrounding area with its first higher-power service than can be rendered on the existing channel, as well as the first local competing service to the community.

2. Submitted herewith is a technical statement prepared by the firm of du Treil, Lundin & Rackley, Inc. Attached as Figure 1 thereto is an FM separation study demonstrating that the chosen reference location for the proposed allotment would be fully spaced

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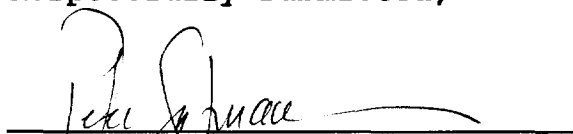
to all known facilities, applications and proposed rulemakings. As stated at pages 1-2 of the Technical Statement, the proposed facility will meet the city coverage requirements of Section 73.315 of the Commission's Rules.

3. Miracle Broadcasting states its present intention to apply for the Channel requested therein if allotted and, if authorized, to build a station promptly.

4. For the foregoing reasons, Miracle Broadcasting respectfully requests that the Commission issue a Notice of Proposed Rulemaking to amend the FM table of allotments as follows:

<u>COMMUNITY</u>	<u>PRESENT</u>	<u>PROPOSED</u>
Ludlow, CA	289A	261B1, 289A

Respectfully submitted,

  
\_\_\_\_\_  
Peter Gutmann  
PEPPER & CORAZZINI  
1776 K Street, N.W.  
Suite 200  
Washington, D.C. 20006  
(202) 296-0600

Counsel for Miracle Broadcasting

June 9, 1992

TECHNICAL STATEMENT  
IN SUPPORT OF PETITION FOR RULE MAKING  
MIRACLE BROADCASTING  
LUDLOW, CALIFORNIA

This technical statement has been prepared on behalf of Miracle Broadcasting in support of a petition for rule making. Miracle Broadcasting proposes that channel 261B1 be allotted to Ludlow as its second local broadcast service.

Channel 261B1 may be allotted to Ludlow in compliance with the minimum distance separation requirements of Section 73.207 of the Commission's Rules. As indicated in Figure 1, the chosen reference location meets the separation requirements of Section 73.207. Since the channel 261B1 proposal is within 320 kilometers of the U.S.-Mexican border, the Commission is respectfully requested to notify this proposal to Mexico as an International Class B assignment for allocation purposes. This proposal meets the Class B separation standards to all known Mexican assignments.

The community of Ludlow<sup>1</sup> is located approximately 12 kilometers from the chosen reference location for the Ludlow allotment (see Figure 1). Since the 70 dBu contour of a maximum Class B1 station will

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<sup>1</sup>The coordinates of Ludlow, as listed in the USGS Geographic Names Information System Population of Places database, are 34°43'24" N, 116°09'54" W.

TECHNICAL STATEMENT  
IN SUPPORT OF PETITION FOR RULE MAKING  
MIRACLE BROADCASTING  
LUDLOW, CALIFORNIA

**Job Title :**Proposed Ludlow, California                      Separation Buffer    32 km  
FCC DB Date : 03/24/92  
**Channel** 261B1 (100.1 MHz)     **Reference Point Coordinates :** 34-47-18 116-03-46

**\*\* End of separation study for channel 261B1 \*\***

/1 Rounds to 145 km under Section 73.208.

*du Treil, Lundin & Rackley, Inc.*

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A Subsidiary of A. D. Ring, P. C.

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Ludlow, California

extend to approximately 23 kilometers, it is anticipated that the proposed facility will meet the requirements of Section 73.315 of the Commission's Rules.

*W. Jeffrey Reynolds*

W. Jeffrey Reynolds

May 26, 1992